

Draft Export Fact Sheet and Information Request

Attached for your information and comment is a fact sheet summarizing the new export notification and demonstration requirements for covered electronic wastes under SB 20. Please note that the fact sheet is a draft and that it may be revised as we receive comments. However, even though it is a draft, the main points of the document are based on current law and can be used as interim guidance by anyone currently exporting and required to comply with the new SB 20 requirements.

Some questions regarding export demonstrations which may provide information for revisions to this fact sheet and development of regulations are:

1. How do exporters track electronic wastes once it is received into the country of import? [volumes received, date received, transport to destination facility]
2. How do exporters (or do you at all) verify how the electronic waste is handled by the receiving facility? How often is the information verified?
3. Do exporters utilize audits that address specific waste management practices (the recycling technologies used; whether the wastes are burned or placed on land as part of the recycling technology; how components of the wastes are managed if they are not recyclable, etc.)?
4. How do exporters verify whether a facility operates in compliance with laws of destination country (use of attorney, receipt of permit/letter of approval by regulatory agency, no verification)?
5. If no law or regulation exists in the destination country relating to the management the imported waste, do contracts impose specific management requirements for these wastes? If so, how is compliance with the contracts verified?
6. Do contracts with importing facility normally require any of the information above or do the contracts only contain provisions regarding the volumes of waste to be exported?

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